

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

DR. RUTH C. MAY AND DR. DONNA E.  
LEDGERWOOD, *on behalf of themselves  
and all others similarly situated*,

Plaintiffs,  
v.

BARCLAYS PLC AND BARCLAYS  
BANK PLC, et al.,

Defendants.

Case No: 23-cv-2583 (LJL)

Case No: 1:24-cv-1872 (LJL)

**JOINT STIPULATION AND  
~~PROPOSED~~ SCHEDULING ORDER**

MICHAEL PUCHTLER, *Individually and  
on Behalf of All Others Similarly Situated*,

Plaintiff,  
v.

BARCLAYS PLC, BARCLAYS  
BANK PLC, JAMES E. STALEY,  
TUSHAR MORZARIA, and  
C.S. VENKATAKRISHNAN,

Defendants.

Case No: 24-cv-1872 (LJL)

**JOINT STIPULATION AND  
~~PROPOSED~~ ORDER SETTING  
SCHEDULE FOR ORAL  
ARGUMENT**

**JOINT STIPULATION AND ~~PROPOSED~~ ORDER  
SETTING SCHEDULE FOR ORAL ARGUMENT**

Plaintiffs Dr. Ruth C. May, Dr. Donna E. Ledgerwood, Justin Reed, Jeffrey Cole Knapp and Mark Howarth (the “May Plaintiffs”) by and through their counsel, Plaintiff Michael Puchtler, by and through his counsel, and Defendants Barclays PLC, Barclays Bank PLC, James E. Staley, Tushar Morzaria, Steven Ewart, C.S. Venkatakrishnan, Tim Throsby, Anna Cross, Nigel Higgins, Alex Thursby, Helen Keelan, Hélène Vletter-van Dort, Jeremy Scott, and Maria Richter, by and through their counsel, hereby stipulate and agree to the following matters:

WHEREAS, on March 27, 2023, Dr. Ruth C. May and Dr. Donna E. Ledgerwood filed a Class Action Complaint against Barclays PLC and Barclays Bank PLC to commence an action, *May v. Barclays PLC*, No. 23-02583 (S.D.N.Y.) (May, ECF No. 1);

WHEREAS, on November 17, 2023, the May Plaintiffs filed an Amended Class Action Complaint (ECF Nos. 68–69) (the “May Amended Complaint”), which added 12 defendants to the Action: James E. Staley, Tushar Morzaria, Steven Ewart, C.S. Venkatakrishnan, Tim Throsby, Anna Cross, Nigel Higgins, Alex Thursby, Helen Keelan, Hélène Vletter-van Dort, Jeremy Scott, and Maria Richter;

WHEREAS, on April 8, 2024, Defendants moved to dismiss the May Amended Complaint (the “May Motion to Dismiss”) (May, ECF Nos. 84–86);

WHEREAS, on June 12, 2024, the Court granted the May Plaintiffs’ motion for oral argument on the May Motion to Dismiss (May, ECF No. 90);

WHEREAS, on March 12, 2024, Michael Puchtler filed a Class Action Complaint against Barclays PLC, Barclays Bank PLC, James E. Staley, Tushar Morzaria, and C.S. Venkatakrishnan to commence an action, *Puchtler v. Barclays PLC*, No. 24-01872 (S.D.N.Y.) (Puchtler, ECF No. 1);

WHEREAS, on July 26, 2024, Michael Puchtler filed an Amended Class Action Complaint (Puchtler, ECF Nos. 44–45) (the “Puchtler Amended Complaint”);

WHEREAS, on August 26, 2024, Defendants in *Puchtler* moved to dismiss the Puchtler Amended Complaint (the “Puchtler Motion to Dismiss”) (Puchtler, ECF Nos. 46–48);

WHEREAS, on January 30, 2025, the Court entered a scheduling order setting the May and Puchtler Motions to Dismiss for oral argument on Friday, March 14, 2025, from 2 p.m. to 5

p.m., in Courtroom 15C, 500 Pearl Street, New York, NY 10007, and instructing the parties to propose a schedule to the Court by no later than February 14, 2025.

NOW, THEREFORE, the Parties, by and through their undersigned counsel of record, hereby agree and stipulate, and respectfully request that the Court order as follows:

1. The Puchtler Motion to Dismiss will be argued first and time will be allocated between the parties as follows:

- a. Defendants' argument (30 minutes)
- b. Plaintiffs' argument (40 minutes)
- c. Defendants' rebuttal (10 minutes)

2. The May Motion to Dismiss will be argued second and time will be allocated between the parties as follows:

- a. Defendants' argument (30 minutes)
- b. Plaintiff's argument (40 minutes)
- c. Defendants' rebuttal (10 minutes)

Dated: New York, NY  
February 14, 2025

/s/ Mazin A. Sbaiti

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/s/ Donald R. Hall

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*Counsel for Michael Puchtler*

**SO ORDERED**

New York, NY

Date: February 14, 2025



The Honorable Lewis J. Liman  
United States District Judge